

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

LEAGUE OF WOMEN VOTERS OF
MISSOURI, et al.,

Plaintiffs,

v.

JOHN R. ASHCROFT,
in his official capacity as the Missouri
Secretary of State, et al.,

Defendants.

Civil Action No. 2:18-cv-04073-BCW

**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL
IN LIGHT OF SETTLEMENT AGREEMENT**

Plaintiffs League of Women Voters of Missouri, St. Louis A. Philip Randolph Institute, and Greater Kansas City A. Philip Randolph Institute and Defendants John R. Ashcroft, in his official capacity as Missouri Secretary of State, and Kenneth Zellers, in his official capacity as Director of the Missouri Department of Revenue (collectively, “Parties”), hereby stipulate and agree as follows:

WHEREAS, on November 18, 2019, the Parties entered into a Settlement Agreement fully and finally resolving this action except with respect to Plaintiffs’ application for fees, expenses, and costs, which the Settlement Agreement explicitly reserved for resolution by this Court; and

WHEREAS, the Settlement Agreement, attached hereto as Exhibit A, requires the Parties to jointly request that the Court retain jurisdiction to enforce the terms of the Settlement Agreement and decide Plaintiffs’ application for fees and costs, but otherwise dismiss the action with prejudice.

THEREFORE, in consideration of the foregoing, the Parties further stipulate and agree that:

(1) In accordance with Section XI of the Parties' Settlement Agreement, the Court shall dismiss this action with prejudice, including all claims asserted by Plaintiffs against Defendants in this matter. The Court shall also vacate any pending deadlines and hearing dates in this matter and lift its Preliminary Injunction Order so that Defendants can implement the changes required by the Settlement Agreement.

(2) Without affecting the finality of this order of dismissal, the Court had and shall retain jurisdiction over this matter to:

(a) Enforce the Settlement Agreement in accordance with its terms for the duration of the Settlement Agreement as set forth in Sections XI and XII; and

(b) Decide Plaintiffs' application for fees and costs pursuant to 52 U.S.C. § 20510(c), which shall be filed on or before January 6, 2020, in accordance with the schedule set by the Court.

IT IS SO ORDERED.

DATED: _____

/s/ _____
JUDGE BRIAN C. WIMES
UNITED STATES DISTRICT COURT

/s/ Melanie Pennycuff

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Respectfully submitted,

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Columbia; practice limited pursuant to D.C.
App. R. 49(c)(3).